

quinn emanuel trial lawyers | washington, dc

777 Sixth Street NW, 11th Floor, Washington, District of Columbia 20001-3706 | TEL (202) 538-8000 FAX (202) 538-8100

WRITER'S DIRECT DIAL NO.
(202) 538-8120

WRITER'S EMAIL ADDRESS
williamburck@quinnemanuel.com

May 15, 2017

VIA ECF AND HAND DELIVERY

The Honorable Dora L. Irizarry
Chief United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Nordlicht, et al., 16-cr-640 (DLI)

Dear Chief Judge Irizarry:

We write on behalf of Defendant Mark Nordlicht to request an opportunity to briefly address the redacted information in the government's opposition to Mr. Nordlicht's motion regarding Rule 6(e), which the government disclosed Friday afternoon pursuant to the Court's order, Dkt. No. 141. Mr. Nordlicht previously requested in his reply an opportunity to address the redacted information in the government's opposition. Dkt. No. 126, at 2 ("Mr. Nordlicht notes that he has prepared this reply without having seen the redacted and sealed information in the government's opposition . . . Mr. Nordlicht respectfully requests an opportunity to address the matters currently under seal in a supplement."). Having reviewed it, the redacted information contains important facts previously unknown to Mr. Nordlicht that demonstrate further why the Court should grant Mr. Nordlicht's motion. Accordingly, we would request leave to file a response by Wednesday, May 17, 2017.

Respectfully submitted,

/s/ William A. Burck
William A. Burck

cc: All counsel of record

quinn emanuel urquhart & sullivan, llp

LOS ANGELES | NEW YORK | SAN FRANCISCO | SILICON VALLEY | CHICAGO | WASHINGTON, DC | HOUSTON | SEATTLE
LONDON | TOKYO | MANNHEIM | MOSCOW | HAMBURG | PARIS | MUNICH | SYDNEY | HONG KONG | BRUSSELS | ZURICH